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Attorneys for the Tudor Respondents

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08 – 13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	Hearing Date: Nov. 13, 2015
	:	Hearing Time: 12:00 p.m. (EST)
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**RENEWAL OF OBJECTION OF THE TUDOR RESPONDENTS
TO THE DEBTORS' MOTION TO ALLOW DISCLOSURE
OF THE DERIVATIVE QUESTIONNAIRES**

The Tudor BVI Global Portfolio L.P., Tudor Family Fund II LLC, Tudor Capital Europe LLP (as manager of Tudor Global Emerging Markets Portfolio L.P.), Tudor Proprietary Trading, L.L.C., Tudor Princeton LLC and Tudor Futures Fund (collectively, the “**Tudor Respondents**”) — are creditors of Lehman Brothers Holdings Inc. (“**LBHI**”) and its Affiliated Debtors¹ (LBHI together with its Affiliated Debtors, the “**Debtors**”) that submitted Derivative Questionnaires in the above-captioned proceeding — by and through their undersigned counsel, hereby (i) renew (this “**Renewal**”) the objection set forth in their Joinder [Docket No. 49125] (the “**Joinder**”) in

¹ Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Original Disclosure Motion (as defined below).

the Objection of Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. [Docket No. 49030] (the “**Citadel Objection**”) to Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code [Docket No. 48939] (the “**Original Disclosure Motion**”), (ii) join in the Objection of the Derivative Questionnaire Respondents to the Original Disclosure Motion filed on March 30, 2015 [Docket No. 49040] (the “**Derivative Questionnaire Respondents’ Objection**”) and (iii) hereby object to the Debtors’ Motion to Renew the Original Disclosure Motion [Docket No. 51312] (the “**Renewed Disclosure Motion**”; together with Original Disclosure Motion, the “**Disclosure Motions**”), notwithstanding the confidentiality provisions set forth in the Court’s Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form [Docket No. 4271] (the “**Bar Date Order**”).

In support of the Joinder and this Renewal, the Tudor Respondents respectfully state as follows:

FACTS

1. On July 2, 2009, the Court entered the Bar Date Order.
2. On March 19, 2015, Movants filed the Original Disclosure Motion.
3. On March 30, 2015, the Citadel Objection was filed.
4. On March 30, 2015, the Derivative Questionnaire Respondents’ Objection was filed.
5. On April 1, 2015, the Tudor Respondents filed the Joinder.
6. On April 2, 2015, Movants filed a Notice of Adjournment of Hearing [Docket No. 49157] on the Original Disclosure Motion.

7. On October 30, 2015, Movants filed the Renewed Disclosure Motion.

ARGUMENT

8. In the Joinder, the Tudor Respondents reserved their rights to amend or supplement the Joinder and to incorporate other objections to the Original Disclosure Motion filed by other parties in interest in a subsequent joinder or at the hearing to consider the Original Disclosure Motion. The Tudor Respondents hereby join the Derivative Questionnaire Respondents' Objection.

9. The legal and factual bases for this Renewal are set forth at length in the Citadel Objection, Derivative Questionnaire Respondents' Objection and the Joinder. Rather than burden the Court with a duplicative filing, the Tudor Respondents hereby fully renew and incorporate the Citadel Objection, Derivative Questionnaire Respondents' Objection and the Joinder as if fully set forth herein.

RESERVATION OF RIGHTS

10. The Tudor Respondents reserve their rights to amend or supplement this Renewal and the Joinder, and to incorporate other objections to the Disclosure Motions filed by other parties in interest in any subsequent joinder or renewal filed with the Court or at the hearing to consider the Disclosure Motions.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Tudor Respondents respectfully request that this Court deny the Disclosure Motions and grant such other and further relief as it may deem just and proper under the circumstances.

Dated: New York, New York
November 6, 2015

SHEARMAN & STERLING LLP

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